



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 5, 2021

By ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Tymel Abrams*, 20 CR 352 (JMF)

Dear Judge Furman,

The Government writes on behalf of the parties and in response to the Orders of the Court dated February 22, 2021 and March 31, 2021 and apologizes for the untimely submission. The parties respectfully request an adjournment of the conference scheduled for April 12, 2021 for approximately sixty days to a date and time that is convenient for the Court in or about the week of June 14, 2021 or thereafter and to set a schedule for pre-trial motions from the defendant for which the parties propose that any pre-trial motion from the defendant be due on June 7, 2021, any response from the Government be due on June 21, 2021, and any reply from the defendant be due on June 28, 2021. The parties believe that they may achieve a pre-trial disposition in the interim but, consistent with the Order of the Court dated February 22, 2021, also wish to put in place a schedule that will allow the case to proceed regardless of any disposition for the defendant, who remains detained at the Metropolitan Detention Center. With the consent of the defendant, the Government respectfully further requests that the Court exclude time under the Speedy Trial Act from April 12, 2021 through the date of any adjournment pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the ends of justice served by such an exclusion and the opportunity that it will permit for the defendant to consider and prepare any pre-trial motion as well as the possibility of any pre-trial disposition outweigh the best interest of the public and the defendant in a speedy trial,

particularly in light of the circumstances of the ongoing national emergency declared in response to the coronavirus pandemic.

Respectfully submitted,


AUDREY STRAUSS
United States Attorney

By: Thomas John Wright
Thomas John Wright
Assistant United States Attorney
(212) 637-2295

Enclosure: Proposed Order

cc: Christopher Flood, Esq. (Counsel to Defendant Tymel Abrams) (by ECF)

Application GRANTED. Any pre-trial motions from the defendant are due by June 7, 2021, any response from the Government is due by June 21, 2021, and any reply from the defendant is due by June 28, 2021. The pretrial conference is adjourned to June 14, 2021, at 2:30 p.m. Time is excluded in the interests of justice from today, until June 14, 2021, for the reasons set forth in the Government's letter. The Clerk of Court is directed to terminate Doc. #36. SO ORDERED.



April 5, 2021

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
TYMEL ABRAMS, :
a/k/a "Ty," :
:
Defendants. :
- - - - - X

ORDER

S1 20 CR 352 (JMF)

Upon the application of the parties, it is hereby
ORDERED that the conference scheduled for April 12, 2021 is
adjourned in favor of a _____ set for _____,
2021 at _____; and

FURTHER ORDERED that any pre-trial motion from the defendant
shall be filed by June 7, 2021; that any response from the
Government shall be filed by June 21, 201; and that any reply from
the defendant shall be filed by June 28, 2021; and

FURTHER ORDERED that time is excluded under the Speedy Trial
Act between April 12, 2021 and _____, 2021; the Court
finds that the ends of justice served by excluding such time
outweighs the interests of the defendant and the public in a speedy
trial because of the interest of the defendant in considering and
preparing any pre-trial motion as well as the possibility of any
pre-trial disposition, particularly in light of the circumstances

of the ongoing national emergency declared in response to the coronavirus pandemic.

SO ORDERED

Dated: New York, New York
_____, 2021

THE HONORABLE JESSE M. FURMAN
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK